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Attorneys for Debtors

### UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS

WICHITA FALLS DIVISION			
IN RE:	§		
MICHAEL EDWARD LEUE and CONMSTANCE ELLEN LEDUE	\$\tag{\tau} \tag{\tau} \tag{\tau}	CASE NO. 19-70323-HI	)H-11
Debtors	§	CHAPTER 11	
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r	§	
Debtors	8	CHAPTER 11

#### DEBTORS' FIRST AMENDED PLAN OF REORGANIZATION, DATED MAY 4, 2020

#### ARTICLE I DISCLOSURE

### A. VOTING PROCEDURE

#### Deadlines for Voting and Objecting; Date of Plan Confirmation Hearing

The Court has not yet confirmed the Plan. This section describes the procedures pursuant to which the Plan will or will not be confirmed.

1.

### Time and Place of the Hearing to Finally Approve This Disclosure Statement and Confirm the Plan

The hearing at which the Court will determine whether to finally approve this Disclosure Statement and confirm the Plan will take place on June 17, 2020, at 10:A. M., at the United States Bankruptcy Court for the Northern District of Texas, Wichita Falls Division, 1000 Lamar Street, Room 216A, U.S. Post Office and Courthouse, Wichita Falls, Texas 76301.

2.

Deadline For Voting to Accept or Reject the Plan

If you are entitled to vote to accept or reject the plan, vote on the enclosed ballot and return the ballot in the enclosed envelope to John A. Leonard, 900 8<sup>th</sup> Street, Suite 320, Wichita Falls, TX 76301. See section XI for a discussion of voting eligibility requirements.

Your ballot must be received by <u>June 1, 2020</u>, or it will not be counted.

#### ARTICLE II.

#### MISCELLANEOUS INFORMATION

#### Deadline For Objecting to the Adequacy of Disclosure and Confirmation of the Plan

Objections to this Disclosure Statement or to the confirmation of the Plan must be filed with the Court and served upon John A. Leonard, 900 8<sup>th</sup> Street, Suite 320, Wichita Falls, TX 76301 by June 8, 2020.

### A. Identity of Person to Contact for More Information

If you want additional information about the Plan, you should contact John Leonard, Leonard, Key, & Key PLLC 900 8<sup>th</sup> Street, Suite 320, Wichita Falls, Texas 76301, phone number (940) 322-5217.

#### B. *Disclaimer*

The Court has conditionally approved this Disclosure Statement as containing adequate information to enable parties affected by the Plan to make an informed judgment about its terms. The Court has not yet determined whether the Plan meets the legal requirements for confirmation, and the fact that the Court has approved this Disclosure Statement does not constitute an endorsement of the Plan by the Court, or a recommendation that it be accepted. The Court's approval of this Disclosure Statement is subject to final approval at the hearing on confirmation of the Plan. Objections to the adequacy of this Disclosure Statement may be filed until?

### C. Current and Historical Financial Conditions

The identity and fair market value of the estate's assets are listed in Exhibit A. Debtors determined the fair market value of the assets based upon their knowledge of the market for the assets and the use of tax valuations.

### D. FINANCIAL INFORMATION

The Debtor's most recent financial statements issued before bankruptcy, each of which was filed with the Court, are set forth in Exhibit B.

### E. DEBTORS' OPERATIONS

The most recent post-petition operating report filed since the commencement of the Debtor's bankruptcy case is set forth in Exhibit C.

### F. Means of Implementing the Plan

# 1. Source of Payments

Payments and distributions under the Plan will be funded in the following manner: Debtors will continue to operate their businesses. The proceeds from the operations will be used to make the plan payments.

### 2. Post-confirmation Management

Debtors shall continue to manage the operations.

## 3. Risk Factors

The proposed Plan has the following risks: As with any business, general economic conditions affect the profitability of the business. However, with the reduction of debt and the amount of payments, plus the fact that Mr. Ledue has been business since 1979, Debtors believe that the risk factors are not any greater than those incurred by any similar business.

### 4. Tax Consequences of Plan

Creditors Concerned with How the Plan May Affect Their Tax Liability Should Consult with Their Accountant, Attorneys, And/Or Advisors.

The following are the anticipated tax consequences of the Plan: Debtors do not anticipate that the Plan will cause them to suffer any adverse tax consequences,

# ARTICLE III. CONFIRMATION REQUIREMENTS AND PROCEDURES

To be confirmable, the Plan must meet the requirements listed in §§ 1129(a) or (b) of the Code. These include the requirements that: the Plan must be proposed in good faith; at least one impaired class of claims must accept the plan, without counting votes of insiders; the Plan must distribute to each creditor and equity interest holder at least as much as the creditor or equity interest holder would receive in a chapter 7 liquidation case, unless the creditor or equity interest holder votes to accept the Plan; and the Plan must be feasible. These requirements are <u>not</u> the only requirements listed in § 1129, and they are not the only requirements for confirmation.

## A. Who May Vote or Object

Any party in interest may object to the confirmation of the Plan if the party believes that the requirements for confirmation are not met.

Many parties in interest, however, are not entitled to vote to accept or reject the Plan. A creditor or equity interest holder has a right to vote for or against the Plan only if that creditor or equity interest holder has a claim or equity interest that is both (1) allowed or allowed for voting purposes and (2) impaired.

In this case, the Plan Proponent believes that classes 2 through 6 are impaired and that holders of claims in each of these classes are therefore entitled to vote to accept or reject the Plan. The Plan Proponent believes that class 1 is unimpaired and that holders of claims in this class, therefore, do not have the right to vote to accept or reject the Plan.

# 1. What Is an Allowed Claim or an Allowed Equity Interest?

Only a creditor or equity interest holder with an allowed claim or an allowed equity interest has the right to vote on the Plan. Generally, a claim or equity interest is allowed if either (1) the Debtor has scheduled the claim on the Debtor's schedules, unless the claim has been scheduled as disputed, contingent, or unliquidated, or (2) the creditor has filed a proof of claim or equity interest, unless an objection has been filed to such proof of claim or equity interest. When a claim or equity interest is not allowed, the creditor or equity interest holder holding the claim or equity interest cannot vote unless the Court, after notice and hearing, either overrules the objection or allows the claim or equity interest for voting purposes pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure.

The deadline for filing a proof of claim in this case was March 16, 2020.

### 2. What Is an Impaired Claim or Impaired Equity Interest?

As noted above, the holder of an allowed claim or equity interest has the right to vote only if it is in a class that is *impaired* under the Plan. As provided in § 1124 of the Code, a class

is considered impaired if the Plan alters the legal, equitable, or contractual rights of the members of that class.

#### 3. Who is Not Entitled to Vote

The holders of the following five types of claims and equity interests are *not* entitled to vote:

- holders of claims and equity interests that have been disallowed by an order of the Court;
- holders of other claims or equity interests that are not "allowed claims" or "allowed equity interests" (as discussed above), unless they have been "allowed" for voting purposes.
- holders of claims or equity interests in unimpaired classes;
- holders of claims entitled to priority pursuant to §§ 507(a)(2), (a)(3), and (a)(8) of the Code; and
- holders of claims or equity interests in classes that do not receive or retain any value under the Plan;
- administrative expenses.

Even If You Are Not Entitled to Vote on the Plan, You Have a Right to Object to the Confirmation of the Plan and to the Adequacy of the Disclosure Statement.

### 4. Who Can Vote in More Than One Class

A creditor whose claim has been allowed in part as a secured claim and in part as an unsecured claim, or who otherwise hold claims in multiple classes, is entitled to accept or reject a Plan in each capacity, and should cast one ballot for each claim.

# B. Votes Necessary to Confirm the Plan

If impaired classes exist, the Court cannot confirm the Plan unless (1) at least one impaired class of creditors has accepted the Plan without counting the votes of any insiders within that class, and (2) all impaired classes have voted to accept the Plan, unless the Plan is eligible to be confirmed by a cram down on non-accepting classes.

### 1. Votes Necessary for a Class to Accept the Plan

A class of claims accepts the Plan if both of the following occur: (1) the holders of more than one-half (1/2) of the allowed claims in the class, who vote, cast their votes to accept the Plan, and (2) the holders of at least two-thirds (2/3) in dollar amount of the allowed claims in the class, who vote, cast their votes to accept the Plan.

A class of equity interests accepts the Plan if the holders of at least two-thirds (2/3) in amount of the allowed equity interests in the class, who vote, cast their votes to accept the Plan.

### 2. Treatment of Nonaccepting Classes

Even if one or more impaired classes reject the Plan, the Court may nonetheless confirm the Plan if the nonaccepting classes are treated in the manner prescribed by § 1129(b) of the Code. A plan that binds nonaccepting classes is commonly referred to as a cram down plan. The Code allows the Plan to bind nonaccepting classes of claims or equity interests if it meets all the requirements for consensual confirmation except the voting requirements of § 1129(a)(8) of the Code, does not discriminate unfairly, and is fair and equitable toward each impaired class that has not voted to accept the Plan.

You should consult your own attorney if a cramdown confirmation will affect your claim or equity interest, as the variations on this general rule are numerous and complex.

### C. Liquidation Analysis

To confirm the Plan, the Court must find that all creditors and equity interest holders who do not accept the Plan will receive at least as much under the Plan as such claim and equity interest holders would receive in a chapter 7 liquidation bankruptcy case. A liquidation analysis is attached to this Disclosure Statement as Exhibit D.

# D. Feasibility

The Court must find that confirmation of the Plan is not likely to be followed by the liquidation, or the need for further financial reorganization, of the Debtor or any successor to the Debtor, unless such liquidation or reorganization is proposed in the Plan.

### 1. Ability to Initially Fund Plan

The Plan Proponent believes that the Debtor will have enough cash on hand on the effective date of the Plan to pay all the claims and expenses that are entitled to be paid on that date. Tables showing the amount of cash on hand on the effective date of the Plan, and the sources of that cash are attached to this plan as Exhibit E.

# 2. Ability to Make Future Plan Payments And Operate Without Further Reorganization

The Plan Proponent must also show that it will have enough cash over the life of the Plan to make the required Plan payments.

The Plan Proponent has provided projected financial information. Those projections are listed in Exhibit F.

The Plan Proponent's financial projections show that the Debtor will have an aggregate annual average cash flow, after paying operating expenses, post-confirmation taxes, and Plan payments of \$5,340.55 for the first three years. After the third year the Plan payments reduce to \$1,992.55.

A cash flow analysis is attached hereto as Exhibit F.

You Should Consult with Your Accountant or other Financial Advisor If You Have Any Questions Pertaining to These Projections.

### ARTICLE IV. EFFECT OF CONFIRMATION OF PLAN

### A. Discharge of Debtor

Discharge. Confirmation of the Plan does not discharge any debt provided for in the Plan until the court grants a discharge on completion of all payments under the Plan, or as otherwise provided in § 1141(d)(5) of the Code. Debtor will not be discharged from any debt excepted from discharge under § 523 of the Code, except as provided in Rule 4007(c) of the Federal Rules of Bankruptcy Procedure.

#### B. Modification of Plan

The Plan Proponent may modify the Plan at any time before confirmation of the Plan. However, the Court may require a new disclosure statement and/or revoting on the Plan.

Upon request of the Debtor, the United States trustee, or the holder of an allowed unsecured claim, the Plan may be modified at any time after confirmation of the Plan but before the completion of payments under the Plan, to (1) increase or reduce the amount of payments under the Plan on claims of a particular class, (2) extend or reduce the time period for such payments, or (3) alter the amount of distribution to a creditor whose claim is provided for by the Plan to the extent necessary to take account of any payment of the claim made other than under the Plan.

#### C. Final Decree

Once the estate has been fully administered, as provided in Rule 3022 of the Federal Rules of Bankruptcy Procedure, the Plan Proponent, or such other party as the Court shall designate in the Plan Confirmation Order, shall file a motion with the Court to obtain an order conditionally closing the case subject to reopening at a later date so that Debtors may get their discharge. Alternatively, the Court may enter such a final decree on its own motion.

The Court has conditionally approved this Disclosure Statement as containing adequate information to enable parties affected by the Plan to make an informed judgment about its terms. The Court has not yet determined whether the Plan meets the legal requirements for confirmation, and the fact that the Court has approved this Disclosure Statement does not constitute an endorsement of the Plan by the Court, or a recommendation that it be accepted. The Court's approval of this Disclosure Statement is subject to final approval at the hearing on confirmation of the Plan. Objections to the adequacy of this Disclosure Statement may be filed until >.

#### ARTICLE V

#### **BACKGROUND INFORMATION**

#### A.

#### **HISTORY OF DEBTORS' BUSINESS**

#### M.E. Ledue Properties:

Throughout his adult life in Wichita Falls, Michael has bought, rented, and sold property. Some were short-term ownerships and others have been long-term. Some have been commercial properties — all of which have been sold at this point; many have been residential. Most of the residential properties were single-family dwellings; however, he owns three buildings that have

"quadruplexes" on them - a single building containing four apartments. At the present time, in addition to the "quads", he owns a single-family house with a separate house on the back of the lot and a parking lot to the side, and two (2) vacant lots (one that could be built on and one that cannot be used for anything other than a vacant lot).

#### M.E. Ledue Construction:

M.E. Ledue Construction came into existence in April of 1979 – shortly after the tornado hit Wichita Falls. It was not an incorporated business, but simply a dba. At some point in the late 80's – early 90's, Michael partnered with a friend who had "Storm King Storm Windows" and he ran both of them. As that faded out, he partnered with another man, who knew glass and glazing, to do a large job at Sheppard Air Force Base. At this point, City Glass & Mirror (a dba) came into existence and M.E. Ledue Construction became a side job. Michael has continued to do construction jobs throughout the years – under this dba.

# City Glass & Mirror – MELM City Glass & Mirror, Inc. dba City Glass & Mirror – MC Team Ltd dba City Glass:

Between bidding and being awarded the job at SAFB and the actual start of the job, the other man sent his regrets and moved to Saudi Arabia for a different job. Michael completed the job and began to build his reputation in glass. He incorporated the business in 2004 as MELM City Glass & Mirror, Inc. with himself as the only stockholder – and continued to build his reputation.

During this time, Connie had been a stay-at-home mother to their children. She had also been a substitute teacher at their children's school for 15-18 years, had eventually gotten her teaching certificate and taught in the public school system for 3 1/2 years. During summer breaks, Connie worked in the office of City Glass & Mirror learning the business and providing coverage for office staff vacations. In June of 2007, she began working full-time at City Glass & Mirror as she prepared to interview for a different kind of position. During the year of 2008, Connie worked full-time as an International Tour Manager – and subsequently worked part-time at that job through 2017. As the office staff was reduced by attrition, Connie assumed their jobs and duties.

Government jobs are put up for bid. There is an advantage in bidding if your company is "minority-owned", "veteran-owned", or "woman-owned". As these can be lucrative jobs, the decision was made to form a new corporation for the business that was "woman-owned." Therefore, in February of 2017, MC Team Ltd was formed; Michael owns 49% of the stock and Connie owns 51%. The dba for this corporation is City Glass.

The primary focus of the business at the current time is commercial work and residential showers.

В.

#### **BUSINESS TRANSACTIONS SINCE FILING**

Since the bankruptcy petition was filed Debtors have continued to operate their business interests.

#### Construction Jobs:

- 1. In Progress O'Briens on Scott Street \$12,760.00 total at this point, \$3,500.00 paid to date. This job is on hold at the moment.
- 2. Gary Mehan Jacksboro Hwy and US 281 continuing. Has received \$6000.00

#### Leasing:

- 1. 14th St. to MC Team Ltd \$150 / month
- 2. Equipment & Tools to MC Team Ltd \$100 / month
- 3. Auto Lease Van to MC Team Ltd \$100 / month
- 4. Auto Lease Truck to MC Team Ltd \$100 / month
- 5. Auto Lease Subaru to MC Team Ltd 488.29 / month

#### Rental Income

1. Quadraplexes rental income of \$20,909.00

#### **ARTICLE VI**

#### PLAN SUMMARY

This Plan of Reorganization (the "Plan") under chapter 11 of the Bankruptcy Code (the "Code") proposes to pay creditors of Michael Edward Ledue and Constance Ellen Ledue (the "Debtors") from cash flow from operations. This Plan provides for 4 classes of secured claims; one class of unsecured claims; and one class of administrative claims. Unsecured creditors holding allowed claims will receive distributions, which the proponent of this Plan has valued at approximately 5% of their claim. This Plan also provides for the payment of administrative and priority claims.

All creditors and equity security holders should refer to Articles III through VI of this Plan for information regarding the precise treatment of their claim. A disclosure statement that provides more detailed information regarding this Plan and the rights of creditors and equity security holders has been circulated with this Plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

### ARTICLE VII CLASSIFICATION OF CLAIMS AND INTERESTS

2.01 Class 1. Administrative Claims

Class 2. Ad valorem Tax Claims

Class 3. Union Square Credit Union

Class 4. FNA DZ

Class 5. Bank of the West

Class 6. First National Bank

Class 7. Unsecured Claims

# ARTICLE VIII TREATMENT OF ADMINISTRATIVE EXPENSE CLAIMS, U.S. TRUSTEES FEES, AND PRIORITY TAX CLAIMS

- 3.01 <u>Unclassified Claims</u>. Under section §1123(a)(1), administrative expense claims, and priority tax claims are not in classes.
- 3.02 <u>Administrative Expense Claims</u>. Each holder of an administrative expense claim allowed under § 503 of the Code will be paid in full on the effective date of this Plan (as defined in Article VII), in cash, or upon such other terms as may be agreed upon by the holder of the claim and the Debtors.
  - 3.03 Priority Tax Claims. Debtors does not owe any priority tax debts
- 3.04 <u>United States Trustee Fees</u>. All fees required to be paid by 28 U.S.C. §1930(a)(6) will accrue and be timely paid until the case is closed, dismissed, or converted to another chapter of the Code. Any U.S. Trustee Fees owed on or before the effective date of this Plan will be paid on the effective date.

### ARTICLE IX TREATMENT OF CLAIMS AND INTERESTS UNDER THE PLAN

4.01 Claims and interests shall be treated as follows under this Plan:

Class	Impairment	Treatment
Class 1 – Administrative Claims	Unimpaired	Paid upon allowance

Class 2 – Ad valorem Tax Claims	Impaired	This claim will be paid over 36 months with interest at 12%
Class 3 – Union Square Credit Union	Impaired	<ul> <li>a. Home Equity Loan-This claim will be paid in full from the sale of the house located at 1605 Carol Lane. Interest will accrue at the rate of 4.5%. Union Square will retain its lien on the property.</li> <li>b. Quadraplex Loan-This claim will be paid over 20 years with interest at 4.5%. Union Square will retain its lien on the property.</li> </ul>
Class 4 – FNA DZ	Impaired	This claim will be paid over 36 months with interest at 15.9%. Claimant will retain its lien on the property.
Class 5 - Bank of the West	Impaired	The claim is secured on a 2015 Subaru Outback, VIN 4S4BSENC9F3226768 and will be paid over sixty (60)
Class 6 - First National Bank	Unimpaired	2212 5 <sup>th</sup> Street, that the class member values at \$94,717.00, will be surrendered to the class member in full satisfaction of its claim of \$32,195.43.

Class 7 -	Impaired	Unsecured Claims - Members of this class shall receive the value, as of the effective date of the
Unsecured		plan, of the property to be distributed under the
		plan on account of such claim that is equal to the
		amount of the claim; or the value of the property
		to be distributed under the plan is not less than
		the projected disposable income of the debtor (as defined in section 1325(b)(2)) to be received
		during the 5-year period beginning on the date
		that the first payment is due under the plan, or
		during the period for which the plan provides
		payments, whichever is longer. Annual payments
		will commence on initial anniversary date of the
		Plan's confirmation and continue on the same
		date of each successive year until the fifth and
		final annual payment has been made. The value of the property to be distributed under the Plan is
		a class member's prorata share of the allowed
		unsecured claims.
		Unsecured Claims – Not withstanding any other
		provisions of the Plan, entities holding unsecured
		claims, unless the entity has previously filed a
		claim, must file a proof of claim on or before 60
		days from the date this Plan is confirmed. If an
		entity does not file a proof of claim timely its
		claim is disallowed. Debtor will have 60 days to review the claim after the filing deadline has
		passed and may file an objection to the claim. If
		an objection is not filed within the applicable
		time period, the claim is deemed allowed. If an
		objection is filed, a hearing will be set pursuant
		the Bankruptcy Rules of Procedure. The claim
		will be treated as provided by the Court's order
		on the objection.

# ARTICLE X ALLOWANCE AND DISALLOWANCE OF CLAIMS

5.01 <u>Disputed Claim</u>. A disputed claim is a claim that has not been allowed or disallowed [by a final non-appealable order], and as to which either: (i) a proof of claim has been filed or deemed filed, and the Debtors or another party in interest has filed an objection; or (ii) no

proof of claim has been filed, and the Debtors has scheduled such claim as disputed, contingent, or unliquidated.

- 5.02 <u>Delay of Distribution on a Disputed Claim</u>. No distribution will be made on account of a disputed claim unless such claim is allowed by a final non-appealable order.
- 5.03 <u>Settlement of Disputed Claims</u>. The Debtors will have the power and authority to settle and compromise a disputed claim with court approval and compliance with Rule 9019 of the Federal Rules of Bankruptcy Procedure.

# ARTICLE XI PROVISIONS FOR EXECUTORY CONTRACTS AND UNEXPIRED LEASES

- 6.01 Assumed Executory Contracts and Unexpired Leases.
- (a) The Debtors assumes the following executory contracts and/or unexpired leases effective upon the effective date of this Plan as provided in Article VII, ISPC:
- (b) The Debtors will be conclusively deemed to have rejected all executory contracts and/or unexpired leases not expressly assumed under section 6.01(a) above, or before the date of the order confirming this Plan, upon the effective date of this Plan. A proof of a claim arising from the rejection of an executory contract or unexpired lease under this section must be filed no later than thirty (30) days after the date of the order confirming this Plan.

## ARTICLE XII MEANS FOR IMPLEMENTATION OF THE PLAN

Debtors will continue to operate their businesses. Connie Ledue will control the financial and management while Michael will control the actual construction. From the income generated from the operations the Debtors will make the payments required by the plan

# ARTICLE XIII GENERAL PROVISIONS

- 8.01 <u>Definitions and Rules of Construction.</u> The definitions and rules of construction set forth in §§ 101 and 102 of the Code shall apply when terms defined or construed in the Code are used in this Plan, and they are supplemented by the following definitions:
  - a. The term "Bankruptcy Code" or "Code" shall mean Title 11 of the United States Code.
  - b. The term "Plan" shall mean Debtors' plan of reorganization.
  - c. The term "year" shall mean 365 days after a certain date.

- d. The term "Court" shall mean the United States Bankruptcy Court for the Northern District of Texas, Wichita Falls Division.
- e. The term "Allowed Claim" shall mean (i) a Claim that has been allowed by a final Order of the Bankruptcy Court or, (ii) a Claim timely filed with the Clerk of the Court or scheduled as liquidated, undisputed and noncontingent by the Debtors in its respective Schedules, Lists, and Statements of Financial Affairs and Executory Contracts heretofore filed with the Bankruptcy Court as they may be amended or supplemented (collectively, the "Schedules"), as to which Claim no objection to the allowance thereof has been interposed within the period of time fixed by the Code or by a final Order of the Bankruptcy Court, or as to which claim either an objection to the claim or an application to amend the Schedules with respect to a scheduled Claim has resulted in the allowance of a Claim, in whole or in part, by a final Order of the Bankruptcy Court. The bar date for filing claim objections is six months after date of confirmation.
- f. The term "substantial consummation" shall mean transfer of property to be transferred under the plan, assumption of management by the Debtors as reorganized, and the commencement of distribution under the plan.
- g. "Administrative Expense" shall mean a cost or expense of the administration of the Chapter 11 case, including any actual and necessary expenses of preserving the estate, and any actual and necessary expenses of operating the Debtors' business from and after the filing date, to and including the date of confirmation, and all costs of administration allowed by the Court in accordance with the Code.
- h. "Impaired Claim" or "Impaired Creditor" shall refer to the definition of an impaired claim or interest set forth in 11 U.S.C. § 1124. Paraphrasing that definition, a claim or interest is impaired if the Plan of Reorganization alters the rights to which the holder of the claim or interest would otherwise be entitled in the absence of the Chapter 11. The Code requires that the Plan designate whether a claim or interest is impaired or unimpaired and specify the treatment to be given impaired claims or interests.
- i. "Secured claim" shall mean an allowed claim of a creditor secured by a lien on property in which the estate has an interest, or that is subject to set off under § 553 of the Code to the extent of the value (determined in accordance with § 506(a) of the Code) of such creditor's interest in the estate's interest in such property or to the extent of the amount subject to set off.
- j. "Unsecured Claim" or "Unsecured Creditor" shall mean any creditor of the Debtors who holds a claim for an unsecured debt, liability, demand or claim of any character whatsoever, including a secured claim to the extent that liquidation of the collateral would not satisfy its claim.
- k. The term "Property" shall mean all that certain real and personal property described in the Debtors' schedules.

- 8.02 <u>Effective Date of Plan</u>. The effective date of this Plan is the eleventh business day following the date of the entry of the order of confirmation. But if a stay of the confirmation order is in effect on that date, the effective date will be the first business day after that date on which no stay of the confirmation order is in effect, provided that the confirmation order has not been vacated.
- 8.03 <u>Severability</u>. If any provision in this Plan is determined to be unenforceable, the determination will in no way limit or affect the enforceability and operative effect of any other provision of this Plan.
- 8.04 <u>Binding Effect</u>. The rights and obligations of any entity named or referred to in this Plan will be binding upon, and will inure to the benefit of the successors or assigns of such entity.
- 8.05 <u>Captions</u>. The headings contained in this Plan are for convenience of reference only and do not affect the meaning or interpretation of this Plan.
- 8.06 <u>Controlling Effect</u>. Unless a rule of law or procedure is supplied by federal law, including the Code or the Federal Rules of Bankruptcy Procedure, the laws of the State of Texas govern this Plan and any agreements, documents, and instruments executed in connection with this Plan, except as otherwise provided in this Plan.
- 8.07 <u>Continuing Jurisdiction.</u> Until all of the obligations of the Debtors are completed hereunder, the Court shall retain jurisdiction to insure that this plan is carried out and determine such other matters in connection with this proceeding, including but not limited to:
  - (a) Determine all valid liens and claims (and amounts) against the Debtors and its property;
  - (b) Allow the Debtors to enforce any claims or causes of action which exists in its favor and which may not have previously been enforced by the Debtors;
  - (c) Settle any disputes between the Debtors and its creditors;
  - (d) Continue jurisdiction and staying enforcement of any liens or claims under confirmation of this plan;
  - (e) Allow the Debtors the rights and powers as Debtors-in-Possession (which includes the rights and powers of a trustee under the Bankruptcy Code existing in favor of a Debtors-in Possession before confirmation), to enforce causes of action which may not have been previously enforced or prosecuted herein by the Debtors as Debtors-In-Possession, and allowing the Debtors to reserve all

of those rights and powers held by it as Debtors-in-Possession before confirmation;

- (f) Approve or confirm a modification of this plan after confirmation proposed by the Debtors, and to grant moratoria and extensions of payments to creditors in any of the classes set out above for any reasonable period of time due to circumstances presently unforeseeable (only the Debtors may propose modifications of the plan after confirmation, pursuant to this retention of jurisdiction provisions of this plan); and
- (g) Retain such other jurisdiction as will insure that the interest and purposes of this plan are fulfilled.

#### ARTICLE XIV DISCHARGE

9.01. <u>Discharge</u>. Confirmation of this Plan does not discharge any debt provided for in this Plan until the court grants a discharge on completion of all payments under this Plan, or as otherwise provided in § 1141(d)(5) of the Code. The Debtors will not be discharged from any debt excepted from discharge under § 523 of the Code, except as provided in Rule 4007(c) of the Federal Rules of Bankruptcy Procedure.

Respectfully submitted,

By: /s/ Michael Edward Ledue
Michael Edward Ledue
/s/ Constance Ellen Ledue
Constance Ellen Ledue
The Plan Proponent

By: /s/ John A. Leonard
Attorney for the Plan Proponent

### **EXHIBIT "A"**

Fill in this information to identify your case and this filing:			
Debtor 1	Michael First Name	Edward Middle Name	Ledue Last Name
Debtor 2	Constance	Ellen Middle Name	Ledue Last Name
(Spouse, if filing)			
United States Bar	ikruptcy Court for the:	NURTHERN	DISTRICT OF TEXAS
Case number (if known)	19-70323-11		

Check if this is an amended filing

#### Official Form 106A/B

#### Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

#### Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

<ol> <li>Do you own or have any legal or equit</li> <li>No. Go to Part 2.</li> <li>Yes. Where is the property?</li> </ol>	table interest in any residence, building, lan	nd, or similar property?	
1.1. 411 Polk Street address, if available, or other description	What is the property? Check all that apply.	Do not deduct secured cla amount of any secured cla Creditors Who Have Clain	ims on Schedule D:
Wichita Falls TX 76301 City State ZIP Code	Duplex or multi-unit building Condominium or cooperative Manufactured or mobile home Land Investment property Timeshare Other	Current value of the entire property? \$42,800.00  Describe the nature of your interest (such as fee sime entireties, or a life estate	ple, tenancy by the
County 411 Polk, Wichita Falls, TX 76301 TR 15A 52X84 Ft Abst 300-J	Who has an interest in the property? Check one.	Fee Simple	
	☐ Debtor 1 only ☐ Debtor 2 only ☑ Debtor 1 and Debtor 2 only ☐ At least one of the debtors and anothe		nunity property
	Other information you wish to add abou property identification number:	t this item, such as local	_

1.2.  1605 Carol Lane Street address, if available, or other description	What is the property? Check all that apply.  ✓ Single-family home  ✓ Duplex or multi-unit building	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D: Creditors Who Have Claims Secured by Property.  Current value of the Current value of the	
Wichita Falls TX 76302 City State ZIP Code  County	Condominium or cooperative Manufactured or mobile home Land Investment property Timeshare Other Who has an interest in the property?	pentire property? \$235,000.00  Describe the nature of your interest (such as fee sime entireties, or a life estate  Fee Simple	ple, tenancy by the
1605 Carol Lane, Wichita Falls, TX 76302 136.87X110X137.05X110 Ft Block 12 Abst 305	Check one.  Debtor 1 only Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and anoth Other information you wish to add abo property identification number:	Check if this is community property (see instructions)	
1.3.  2209 4th Street  Street address, if available, or other description	What is the property? Check all that apply.  ☐ Single-family home ☐ Duplex or multi-unit building	Do not deduct secured cla amount of any secured cla Creditors Who Have Claim Current value of the	ims on <i>Schedule D:</i> s Secured by Property.  Current value of the
Wichita Falls TX 76301 City State ZIP Code	☐ Condominium or cooperative ☐ Manufactured or mobile home ☐ Land ☐ Investment property ☐ Timeshare ☐ Other	\$250,000.00  Describe the nature of your interest (such as fee simple entireties, or a life estate)	ole, tenancy by the
County 2209 4th Street, Wichita Falls, TX	Who has an interest in the property? Check one.	Fee Simple	
76301 Lot 3A Bumgarner Subdivision	□ Debtor 1 only     □ Debtor 2 only     ☑ Debtor 1 and Debtor 2 only     □ At least one of the debtors and anoth	Check if this is comm (see instructions)	nunity property
	t-d-mil		<del>_</del> ,

Debtor 1 Michael Edward Ledue Constance Ellen Ledue	Ca	ase number (if known)	
1.4.  2210 5th Street Street address, if available, or other description  Wichita Falls City State ZIP Code  County  2210 5th Street, Wichita Falls, TX 76301 Lot 1 Bumgarner S/D	What is the property? Check all that apply.  Single-family home Duplex or multi-unit building Condominium or cooperative Manufactured or mobile home Land Investment property Timeshare Other Who has an interest in the property? Check one. Debtor 1 only Debtor 2 only At least one of the debtors and another	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D:  Creditors Who Have Claims Secured by Property.  Current value of the entire property?  \$125,000.00  Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.  Fee Simple  Check if this is community property (see instructions)	
1.5.  1917 9th Street Street address, if available, or other description	Other information you wish to add about property identification number:  What is the property? Check all that apply.  Single-family home	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D:  Creditors Who Have Claims Secured by Property.	
Wichita Falls TX 76301	Duplex or multi-unit building Condominium or cooperative Manufactured or mobile home	Current value of the entire property?  \$50,000.00  Current value of the portion you own?  \$50,000.00	
County  1917 9th Street, Wichita Falls, TX	☐ Land ☐ Investment property ☐ Timeshare ☐ Other ☐ Who has an interest in the property?	Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.  Fee Simple	
76301 50X20 Ft Lot 1 Blk 12 Bellevue Addition	Check one.  Debtor 1 only Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and another  Other information you wish to add about property identification number:		

Debtor 1 Michael Edward Ledue Constance Ellen Ledue		Case number (if known)
1.6. 1915 9th Street Street address, if available, or other description  Wichita Falls TX 76301	What is the property? Check all that apply. Single-family home Duplex or multi-unit building Condominium or cooperative Manufactured or mobile home	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D:  Creditors Who Have Claims Secured by Property.  Current value of the Current value of the entire property? portion you own?  \$12,000.00 \$12,000.00
City State ZIP Code  County	☐ Land ☐ Investment property ☐ Timeshare ☐ Other ☐ Who has an interest in the property?	Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.  Fee Simple
1915 9th Street, Wichita Falls, TX 76301 Lot 1; A Blk 12 Bellvue Addition	Check one.  Debtor 1 only Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and anoth Other information you wish to add abo property identification number:	
1.7. 2116 Roberts Street address, if available, or other description	What is the property? Check all that apply.  ☐ Single-family home	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D: Creditors Who Have Claims Secured by Property.
Wichita Falls TX 76301 City State ZIP Code	☐ Duplex or multi-unit building ☐ Condominium or cooperative ☐ Manufactured or mobile home ☐ Land ☐ Investment property ☐ Timeshare	Current value of the entire property? Current value of the portion you own?  \$3,000.00 \$3,000.00  Describe the nature of your ownership interest (such as fee simple, tenancy by the
County 2116 Roberts, Wichita Falls, TX 76301	Other Who has an interest in the property?	entireties, or a life estate), if known. Fee Simple
	Debtor 1 only Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and anoth Other information you wish to add abor	

Debtor 2 Constance Ellen Ledue		Case number (if known)19-7	70323-11
1.8.  1410 25th Street Street address, if available, or other description	What is the property? Check all that apply.  Single-family home Duplex or multi-unit building Condominium or cooperative	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D:  Creditors Who Have Claims Secured by Property.  Current value of the Current value of the entire property? portion you own?	
Wichita Falls TX 76301 City State ZIP Code	☐ Manufactured or mobile home ☐ Land ☐ Investment property ☐ Timeshare	\$2,500.00  Describe the nature of your interest (such as fee simple)	\$2,500.00  our ownership ple, tenancy by the
County 1410 25th Street, Wichita Falls, TX 76301	Who has an interest in the property? Check one.  ☑ Debtor 1 only ☐ Debtor 2 only ☐ Debtor 1 and Debtor 2 only ☐ At least one of the debtors and anoth	entireties, or a life estate), if known.  Fee Simple  Check if this is community property (see instructions)	
1.9. 1408 14th Street Street address, if available, or other description	Other information you wish to add about property identification number:  What is the property? Check all that apply.  Single-family home	Do not deduct secured clai amount of any secured cla Creditors Who Have Claim	s Secured by Property.
Wichita Falls TX 76301 City State ZIP Code	Duplex or multi-unit building Condominium or cooperative Manufactured or mobile home Land Investment property Timeshare	Current value of the entire property? \$82,000.00  Describe the nature of your interest (such as fee simple)	ple, tenancy by the
County 1408 14th Street, Wichita Falls, TX	Who has an interest in the property? Check one.	entireties, or a life estate) Fee Simple	), if known.
76301 Lot 3-A BIk 252 Original Townsite	Debtor 1 only Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and another		nunity property

Debtor 1 Michael Edward Ledue Constance Ellen Ledue	Ca	se number (if known)19-7	0323-11	
1.10. 2212 5th St. Street address, if available, or other description	What is the property? Check all that apply.  Single-family home Duplex or multi-unit building Condominium or cooperative	Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D:  Creditors Who Have Claims Secured by Property.  Current value of the entire property?  \$125,000.00  Describe the nature of your ownership interest (such as fee simple, tenancy by the		
Wichita Falls TX 76301 City State ZIP Code	Manufactured or mobile home Land Investment property Timeshare			
County  2212 5th St., Wichita Falls, TX 76301	Other Who has an interest in the property? Check one.	entireties, or a life estate) Fee SImple	, if known.	
Lot 1-C, Blk 1, Ledue S/D Abst 350	☐ Debtor 1 only ☐ Debtor 2 only ☑ Debtor 1 and Debtor 2 only ☐ At least one of the debtors and another	Check if this is community property (see instructions)		
	Other information you wish to add about property identification number:	this item, such as local	_	
	own for all of your entries from Part 1, incl Part 1. Write that number here		\$927,300.00	
Do you own, lease, or have legal or equitable you own that someone else drives. If you lease  3. Cars, vans, trucks, tractors, sport utility  □ No □ Yes	a vehicle, also report it on Schedule G: Exec			
3.1. Make: Subaru	Who has an interest in the property? Check one.  Debtor 1 only	Do not deduct secured clair amount of any secured clair Creditors Who Have Claims	ms on Schedule D:	
Model: Outback Year: 2015 Approximate mileage: 62,000	Debtor 2 only Debtor 1 and Debtor 2 only At least one of the debtors and another	Current value of the entire property?	Current value of the portion you own? \$17,000.00	
Other information: 2015 Subaru Outback (approx. 62,000 miles)	Check if this is community property (see instructions)			
Make: Dodge  Model: Ram Promaster 150  Year: 2014	Who has an interest in the property? Check one.  ☑ Debtor 1 only ☐ Debtor 2 only ☐ Debtor 1 and Debtor 2 only	Do not deduct secured clair amount of any secured clair Creditors Who Have Claims Current value of the entire property?	ms on Schedule D:	
Approximate mileage: 80,000 Other information: 2014 Dodge Ram Promaster 1500 (approx. 80,000 miles)	☐ At least one of the debtors and another ☐ Check if this is community property (see instructions)	\$15,300.00	\$15,300.00	

		l Edward Ledue nce Ellen Ledue	Ca	se number (if known)19-7	70323-11
Mo Ye. Ap	ke: del:	Lincoln Towncar 1996 120,000	Who has an interest in the property? Check one.  ☑ Debtor 1 only ☐ Debtor 2 only ☐ Debtor 1 and Debtor 2 only ☐ At least one of the debtors and another	amount of any secured cla Creditors Who Have Clain Current value of the entire property?	
19	96 Lincoln Town 0,000 miles)	car (approx.	Check if this is community property (see instructions)		
Yes Apr Oth 19	ke: del: ar: proximate mileage: ner information: 95 Jaguar XJS C 000 miles) Watercraft, aircra	onvertible (approx.	Who has an interest in the property? Check one.  ☐ Debtor 1 only ☐ Debtor 2 only ☐ Debtor 1 and Debtor 2 only ☐ At least one of the debtors and another ☐ Check if this is community property (see instructions) s and other recreational vehicles, other vehicle watercraft, fishing vessels, snowmobiles, manual vehicles, other vehicles.	amount of any secured cla Creditors Who Have Clain Current value of the entire property? \$5,100.00	
5.	entries for pages	you have attached for	own for all of your entries from Part 2, inclu Part 2. Write that number here		\$39,025.00
	you own or have a		nterest in any of the following items?		Current value of the portion you own? Do not deduct secured claims or exemptions.
	Examples: Major	e Household good			\$5,000.00
7.	•	collections; electronic d	video, stereo, and digital equipment; compute evices including cell phones, cameras, media iPads, printers, VHS/DVD player		\$3,000.00
8.	•	es and figurines; paintin	gs, prints, or other artwork; books, pictures, or collections; other collections, memorabilia, coll	• •	1
	Yes. Describe	<b>9</b>			
9.	canoes	, photographic, exercise	, and other hobby equipment; bicycles, pool to tools; musical instruments	ables, golf clubs, skis;	
	☐ No ☑ Yes. Describe	Golf clubs (ladie	es)		\$200.00

	otor 2	Constance l			-70323-11
10.	Firearn Exampl		es, shotguns	s, ammunition, and related equipment	
	☑ No ☐ Yes	s. Describe			
11.	•		clothes, furs,	leather coats, designer wear, shoes, accessories	<b>⊸</b> l.
	☑ No ☐ Yes	Describe			]
12.	Jewelry Example		-	ume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, geme	5,
	☐ No ☑ Yes	. Describe	See conti	nuation page(s).	\$9,000.00
13.		m animals es: Dogs, cats	, birds, horse	es	_
		. Describe			]
14.	Any oth		nd househo	ld items you did not already list, including any health aids you	
		. Give specific			Ī
15.				r entries from Part 3, including any entries for pages you have	\$17,200.00
Pa	art 4:	Ī		ncial Assets	
				table interest in any of the following?	Current value of the portion you own? Do not deduct secured claims or exemptions.
16.	Cash Example	es: Money you petition	have in you	r wallet, in your home, in a safe deposit box, and on hand when you file your	
	□ No ☑ Yes			Cash:	\$100.00
17.		-	nouses, and	ther financial accounts; certificates of deposit; shares in credit unions, other similar institutions. If you have multiple accounts with the same	
	□ No ☑ Yes.			Institution name:	
	17.	1. Checking	account:	Checking account; Bank of America	\$245.00
	17.2	2. Checking	account:	Checking account; Wells Fargo	\$300.00
	17.3	3. Savings a	ccount:	Savings account; Bank of America	\$60.00
	17.4	i. Savings a	ccount:	Savings account; Wells Fargo	\$230.00
	17.5	5. Savings a	ccount:	Savings account; Wells Fargo	\$80.00

	otor 1 otor 2	Michael Edward Constance Eller					Case numb	per (if known) <b>19-7</b>	0323-11
	17	7.6. Savings acco	unt:	Saving	ıs account; \	Wells Fargo	-with Minor		\$150.00
	17	7.7. Savings acco	unt:	Saving	s account; \	Wells Fargo	-with Minor		\$155.00
18.	Bonds	, mutual funds, or p	publicly tra	aded sto	cks				
	Examp.	les: Bond funds, inv	estment a	accounts v	with brokerage	e firms, money	market accounts		
		S	Institutio	n or issue	er name:				
19.	-	iblicly traded stock rest in an LLC, part			-	and unincorp	orated businesses,	including	
	□ No	s. Give specific							
		ormation about							
	the	m	Name of	-	55			% of ownership;	
				lue Prop			<u>-</u>	100%	\$0.00
					struction		·	100%	Unknown
			MC Tea	ım LTD				100%	Unknown
20.	Negotia		ude perso	nal check	ks, cashiers' ch	hecks, promis	tiable instruments sory notes, and mone signing or delivering t	=	
		s. Give specific ormation about							
	the	m	issuer na	ame:					
21.		nent or pension acc es: Interests in IRA, profit-sharing pl	, ERISA, K	Keogh, 40°	1(k), 403(b), th	hrift savings a	ccounts, or other pen	nsion <b>o</b> r	
	Ø No	12.4							
		i. List each ount separately.     1	Type of ac	count:	Institution	name:			
22.	Your sh		posits you	ı have ma	•	-	e service or use from c, gas, water), telecon		
	☑ No □ Yes	i		ı	Institution nam	ne or individua	al:		
23.	Annuiti	es (A contract for a	specific p	periodic pa	ayment of mor	ney to you, eit	her for life or for a nu	mber of years)	
	☑ No ☐ Yes		Issuer na	me and de	lescription:				
24.		s in an education I C. §§ 530(b)(1), 529.			•	ABLE progra	am, or under a quali	fied state tuition pro	ogram.
	☑ No ☐ Yes		Institution	name an	nd description.	. Separately f	ile the records of any	interests. 11 U.S.C.	. § 521(c)
25.		equitable or future exercisable for you			rty (other tha	ın anything li	sted in line 1), and ri	ights or	
	M No	excitoisable for yo	ur benent	•					*1
	_	. Give specific rmation about them							
26.		, copyrights, trader es: Internet domain	· ·		-		roperty; licensing agreements	i	•
	₩ No	. Give specific	T						ľ
		rmation about them							-

	tor 1 tor 2	Constance Ellen Le		Case number (if known	19-70323-11
27.	Example No Yes	es, franchises, and oth es: Building permits, ex s. Give specific ermation about them	er general intangibles clusive licenses, cooperative association l	noldings, liquor licenses, professio	onal licenses
Moi		operty owed to you?			Current value of the
					portion you own? Do not deduct secured claims or exemptions.
28.	Tax ref	unds owed to you			
	abo you	. Give specific informat ut them, including wheth already filed the returns the tax years	ner   S		Federal: State: Local:
29.		support es: Past due or lump su	m alimony, spousal support, child support,	maintenance, divorce settlement	, property settlement
	Mo Yes	. Give specific informat	ion	Alimony:	
				Maintenan	ce:
				Support:	
				Divorce se	ettlement:
				Property s	ettlement:
30.	Example  No	compensation, Socia	oility insurance payments, disability benefit al Security benefits; unpaid loans you mad		
	☑ Yes	. Give specific informati	See continuation page(s).		\$48,547.07
31.	Example No Yes com	s in insurance policies es: Health, disability, or  Name the insurance pany of each policy list its value	life insurance; health savings account (HS  Company name:  Farmers New World Life	A); credit, homeowner's, or renter Beneficiary:	's insurance Surrender or refund value:
			P. O. Box 248831 Oklahoma City, OK 73124-8831	Michael Ledue	\$0.00
			New World Life P. O. Box 248831 Oklahoma City, OK 73124-8831	Michael Ledue	\$0.00
			Northwestern Mutual Client Relations Center 2 Lincoln Centre #1300 5420 Lyndon B Johnson Dallas, TX 75240	Connie Ledue	\$0.00
			AFLAC 1932 Wynnton Rd. Columbus, GA 31999	Michael Ledue	\$0.00

	btor 1 btor 2		Edward Ledue se Ellen Ledue Case number (if known)19	9-70323-11
32.	If you a	re the benef	operty that is due you from someone who has died ficiary of a living trust, expect proceeds from a life insurance policy, or are currently property because someone has died	
	☑ No ☐ Yes	. Give spec	cific information	
33.	<i>Example</i> No	es: Acciden	rd parties, whether or not you have filed a lawsuit or made a demand for payment its, employment disputes, insurance claims, or rights to sue	
	☐ Yes	. Describe	each claim	
34.		ontingent a o set off cla	and unliquidated claims of every nature, including counterclaims of the debtor and nims	
	-	. Describe	each claim Unclaimed property-Michael LeDue	\$717.00
35.	Any fina	ancial asset	ts you did not already list	
	☑ No ☐ Yes	. Give spec	pific information	
36.			e of all of your entries from Part 4, including any entries for pages you have . Write that number here	\$50,584.07
P	art 5:	Describe	Any Business-Related Property You Own or Have an Interest In. List ar	v real estate in Part 1
37.	□ No.	own or hav Go to Part ( . Go to line		Current value of the portion you own?
20	A	ta saasinahi	le or commissions you already earned	Do not deduct secured claims or exemptions.
JO,	∏ No	IS IECEIVADI	ie of Commissions you arready earned	
		Describe	Unpaid rent	\$5,486.00
39.		s: Business	furnishings, and supplies s-related computers, software, modems, printers, copiers, fax machines, rugs, telephones, hairs, electronic devices	_
	□ No ☑ Yes.	Describe	Computer, printers, scanners, copiers, phone system, desks, chairs, file cabinets, credit card scanner	\$4,500.00
40.	Machine	ery, fixtures	, equipment, supplies you use in business, and tools of your trade	
	☐ No ☑ Yes.	Describe	See continuation page(s).	\$14,300.00
11.				\$14,500,00
	Inventor	у		\$14,500.00

	otor 1 otor 2	Michael Edward Ledue Constance Ellen Ledue	Case number (if know	n) _ <b>19-70323-11</b>
42.	Interest	s in partnerships or joint ventures		
	<b>☑</b> No	· · · · · · · · · · · · · · · · · · ·		
		. Describe Name of entity:	% of own	ership:
43.	Custom	er lists, mailing lists, or other comp	ilations	
	☑ No □ Yes	. Do your lists include personally id ☐ No ☐ Yes. Describe	lentifiable information (as defined in 11 U.S.C. § 101(41A)	)?
44.	Any bus	siness-related property you did not	already list	
	□ No ☑ Yes	. Give specific information.		
	18	ft trailer		\$1,500.00
	40	ft storage trailer		\$1,500.00
45.			om Part 5, including any entries for pages you have	\$27,286.00
P		Describe Any Farm- and Com f you own or have an interest in	mercial Fishing-Related Property You Own or farmland, list it in Part 1.	Have an Interest In.
46.	<b>D</b> o you	own or have any legal or equitable i	nterest in any farm- or commercial fishing-related prope	rty?
	☑ No.	Go to Part 7.		
	☐ Yes	Go to line 47.		
47	Farm an	imala		Current value of the portion you own? Do not deduct secured claims or exemptions.
41.	Example	s: Livestock, poultry, farm-raised fish		
	☑ No ☐ Yes.			
48.	Crops	either growing or harvested		
		Give specific		
49.	Farm an	d fishing equipment, implements, m	achinery, fixtures, and tools of trade	
	☑ No ☐ Yes.			
50	Farm an	d fishing supplies, chemicals, and f	ed.	
	Mo No	a norming supplies, one modes, and h		
	Yes.			
51.	Any farn	n- and commercial fishing-related pr	operty you did not already list	
	_	Give specific		

	otor 1 otor 2	Constance Ellen Ledue	Case no	umber (if known)	19-70323-11	
		ne dollar value of all of your entries from Part 6, including any entries for pages you have ned for Part 6. Write that number here				\$0.00
Ρ	art 7:	Describe All Property You Own or Have an I	nterest in That You [	oid Not List Abo	ove	
53.		have other property of any kind you did not already lises: Season tickets, country club membership	st?			
	☑ No ☐ Yes	s. Give specific information.				
54.	Add the	e dollar value of all of your entries from Part 7. Write th	nat number here		→	\$0.00
P	art 8:	List the Totals of Each Part of this Form				
55.	Part 1:	Total real estate, line 2			<b>&gt;</b> ,	\$927,300.00
56.	Part 2:	Total vehicles, line 5	\$39,025.00			
57.	Part 3:	Total personal and household items, line 15	\$17,200.00			
58.	Part 4:	Total financial assets, line 36	\$50,584.07			
59.	Part 5:	Total business-related property, line 45	\$27,286.00			
60.	Part 6:	Total farm- and fishing-related property, line 52	\$0.00			
61.	Part 7:	Total other property not listed, line 54	+\$0.00			
62.	Total pe	ersonal property. Add lines 56 through 61	\$134,095.07	Copy personal property total	<b>+</b>	\$134,095.07
63.	Total of	Fall property on Schedule A/B. Add line 55 + line 62			\$	1,061,395.07

	otor 1 otor 2	Michael Edward Ledue Constance Ellen Ledue	Case number (if known)	19-70323-11	
12.	Jewelr	y (details):			
	Mens	& womens clothing		5	\$500.00
	Mens	& womens jewelry		-	\$8,500.00
30.	Other a	amounts someone owes you (details):			
	Unpai	d wages from MC Team LTD			\$15,607.14
	Unpai	d wages from MC Team LTD-codebtor		-	\$15,607.14
	Insura	nce proceeds held by Union Square-4th Street			\$9,898.58
	Insura	nce proceeds held by Union Square-4th Street			\$7,434.21
40.	Machin	ery, fixtures, equipment, supplies γου use in business, and tools of	your trade (details):		
	2008 0	SMC Sierra 1500 (approx. 220,000 miles)		-	\$4,600.00
	Applia	nces, lawn equipment, saws, break metal bender			\$9,700.00

# **EXHIBIT "B"**

3:44 PM 12/18/19 Accrual Basis

# M.E. Ledue Properties / M.E. Ledue Construction Balance Sheet

As of December 18, 2019

	Dec 18, 19
ASSETS Current Assets Checking/Savings DIP Account	862.50
Total Checking/Savings	862.50
Accounts Receivable Accounts Receivable	30,628.72
Total Accounts Receivable	30,628.72
Other Current Assets Undeposited Funds	1,834.00
Total Other Current Assets	1,834.00
Total Current Assets	33,325.22
TOTAL ASSETS	33,325.22
LIABILITIES & EQUITY Liabilities Current Liabilities Accounts Payable Accounts Payable	3,255.68
Total Accounts Payable	3,255.68
Total Current Liabilities	3,255.68
Long Term Liabilities Notes Payable USCU - Quads -76719-19	149,386.40
Total Notes Payable	149,386.40
Total Long Term Liabilities	149,386.40
Total Liabilities	152,642.08
Equity Opening Bal Equity Owners Draw/Equity Retained Earnings Net Income	-276,185.56 258,538.68 561,283.32 23,879.79
Total Equity	567,516.23
TOTAL LIABILITIES & EQUITY	720,158.31

3:49 PM 12/18/19

### M.E. Ledue Properties / M.E. Ledue Construction Statement of Cash Flows

January 1 through December 18, 2019

	Jan 1 - Dec 18, 19
OPERATING ACTIVITIES  Net Income  Adjustments to reconcile Net Income to net cash provided by operations:  Accounts Receivable  Accounts Payable	23,879.79 16,539.21 2,588.66
Net cash provided by Operating Activities	43,007.66
INVESTING ACTIVITIES Shareholder Loan	-787.00
Net cash provided by Investing Activities	-787.00
FINANCING ACTIVITIES  Notes Payable:FNB of WF - 9th St.  Notes Payable:Property Tax Loan  Notes Payable:USCU - Quads -76719-19  Owners Draw/Equity	-5,940.00 -27,200.13 24,339.83 -3,250.00
Net cash provided by Financing Activities	-12,050.30
Net cash increase for period	30,170.36
Cash at beginning of period	6,546.96
Cash at end of period	36,717.32

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12/18/19

### **Profit & Loss**

Accrual Basis

January 1 through December 18, 2019

	Jan 1 - Dec 18, 19
Ordinary Income/Expense	
Income Fee Income	110.00
Rental Sales	65,478.00 13,650.36
Total Income	79,238.36
Gross Profit	79,238.36
Expense	
Automoblie Expense Bank Service Charges	50.00 152.00
Cleaning Service Contract Labor Filing Fees HVAC Insurance	411.35 1,312.50 376.00 486.44 4,023.25
Interest Expense Finance Charge Loan Interest	6.25 3,420.75
Total Interest Expense	3,427.00
Lawn Service Reconciliation Discrepancies Repairs	290.00 -200.00
Building Repairs Equipment Repairs Plumbing	764.80 350.75 666.83
Total Repairs	1,782.38
Supplies Office	48.90
Total Supplies	48.90
Taxes Property	11,864.49
Total Taxes	11,864.49
Utilities Electric Water Utilities - Other	1,356.48 7,493.57 21.00
Total Utilities	8,871.05
Total Expense	32,895.36
Net Ordinary Income	46,343.00
Other Income/Expense Other Expense Bad Debt	22,463.21
Total Other Expense	22,463.21
Net Other Income	-22,463.21
Not Income	23,879.79

### **EXHIBIT "C"**

B 25C (Official Form 25C) (12/08)

### UNITED STATES BANKRUPTCY COURT

Northern ! Eastern District of Texas

In re Michael E. + Constance E. Ledue

Deblor

Case No. 19-70323-hdh11

Small Business Case under Chapter 11

### SMALL BUSINESS MONTHLY OPERATING REPORT

Mor	nth: March	Date filed:	4-20-	20	
	3	NA ISC Codes	531110		36118
	e of Business: Rental Properties Construction		531120		36 z 20
PER AC(	ACCORDANCE WITH TITLE 28, SECTION 1746, OF THE UNITEI RJURY THAT I HAVE EXAMINED THE FOLLOWING SMALL BU COMPANYING ATTACHMENTS AND, TO THE BEST OF MY KN RRECT AND COMPLETE.	ISINESS MONTHI	Y OPERATIN	G KEPOK	I AND THE
RES	SPONSIBLE PARTY:				
	. 10: Chamarable Ports	<del></del>			
Orig	ginal Signature of Responsible Party				
Ç.	nstance Ledue	<b>_</b> 3			
Prin	ned Name of Responsible Party				
Que	estionnaire: (All questions to be answered on behalf of the debtor.)			Yes	No
ì.	IS THE BUSINESS STILL OPERATING?			⊈′	
2.	HAVE YOU PAID ALL YOUR BILLS ON TIME THIS MONTH?			F	, o
3.	DID YOU PAY YOUR EMPLOYEES ON TIME?				4/4 D
<b>4</b> .	HAVE YOU DEPOSITED ALL THE RECEIPTS FOR YOUR BUSITHIS MONTH?	INESS INTO THE	DIP ACCOUNT	T <b>⊡</b> ∕	O
5.	HAVE YOU FILED ALL OF YOUR TAX RETURNS AND PAID AMONTH	ALL OF YOUR TA	XES THIS	Œ⁄	0
<b>5</b> .	HAVE YOU TIMELY FILED ALL OTHER REQUIRED GOVERN	MENT FILINGS?		<b>y</b>	
7.	HAVE YOU PAID ALL OF YOUR INSURANCE PREMIUMS TH	IS MONTH?		Ø	ø
ŝ.	DO YOU PLAN TO CONTINUE TO OPERATE THE BUSINESS N	EXT MONTH?		Ø	O
).	ARE YOU CURRENT ON YOUR QUARTERLY FEE PAYMENT	TO THE U.S. TRU	STEE?	র্ভ	
0.	HAVE YOU PAID ANYTHING TO YOUR ATTORNEY OR OTHE MONTH?	ER PROFESSIONA	LS THIS	D	O
	DID YOU HAVE ANY UNUSUAL OR SIGNIFICANT UNANTICE MONTH?			(3/	
	HAS THE BUSINESS SOLD ANY GOODS OR PROVIDED SERV ASSETS TO ANY BUSINESS RELATED TO THE DIP IN ANY W	AY?		<i>-</i>	œ⁄
2	DO YOU HAVE ANY BANK ACCOUNTS OPEN OTHER THAN	THE DIP ACCOUN	VT?	⊡∕	♬

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			Page 2
B 25	C (Official Form 25C) (12/08)		
14.	HAVE YOU SOLD ANY ASSETS OTHER THAN INVENTORY THIS MONTH?	0	Ø
15.	DID ANY INSURANCE COMPANY CANCEL YOUR POLICY THIS MONTH?	ø	<b>©</b> /
16.	HAVE YOU BORROWED MONEY FROM ANYONE THIS MONTH?		<b>ভ</b>
17.	HAS ANYONE MADE AN INVESTMENT IN YOUR BUSINESS THIS MONTH?	O	<b>D</b>
18.	HAVE YOU PAID ANY BILLS YOU OWED BEFORE YOU FILED BANKRUPTCY?	ø	Ø
	TAXES		
	YOU HAVE ANY PAST DUE TAX RETURNS OR PAST DUE POST-PETITION TAX	o⁄	
BEF	ES, PLEASE PROVIDE A WRITTEN EXPLANATION INCLUDING WHEN SUCH RETURNS WILL FILED, OR WHEN SUCH PAYMENTS WILL BE MADE AND THE SOURCE OF THE FUNDS FOR PAYMENT.		
	(Exhibit A)		
	INCOME		
SHO	ASE SEPARATELY LIST ALL OF THE INCOME YOU RECEIVED FOR THE MONTH. THE LIST ULD INCLUDE ALL INCOME FROM CASH AND CREDIT TRANSACTIONS. (THE U.S. TRUSTEE WAIVE THIS REQUIREMENT.)		
	TOTAL INCOME	s 270	9,00
	SUMMARY OF CASH ON HAND		
	Cash on Hand at Start of Month	-	4,34
	Cash on Hand at End of Month	s 35	3.78
PLE	ASE PROVIDE THE TOTAL AMOUNT OF CASH CURRENTLY AVAILABLE TO YOU TOTAL  (Exhibit B)	s 353	3.78
	·		
	EXPENSES		
ACCO	SE SEPARATELY LIST ALL EXPENSES PAID BY CASH OR BY CHECK FROM YOUR BANK DUNTS THIS MONTH. INCLUDE THE DATE PAID, WHO WAS PAID THE MONEY, THE POSE AND THE AMOUNT. (THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)		
	TOTAL EXPENSES	s_3515	.92
	(Exhibit C)		
	CASH PROFIT		
NCO	ME FOR THE MONTH <i>(total from exhibit b)</i>	s 315.	3.39
EXPE	NSES FOR THE MONTH (TOTAL FROM EXHIBIT C)	s 35 13	<u> </u>
	(Subtract Line C from Line B) CASH PROFIT FOR THE MONTH	<b>s</b>	259

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### M.E. Ledue Construction M.E. Ledue Properties

PO Box 3813 • Wichita Falls, TX 76301 • mledue@gmail.com • 940-723-8515

April 20, 2020

M. E. Ledine Construction

### SMALL BUSINESS MONTHLY OPERATING REPORT

Re: "Taxes", pg 2

Our 2018 tax return has not been filed. An extension has been filed for this return. We hope to have this filed soon.

We do not anticipate owing any taxes.

Constance Ledue

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March

M.E. LeGas 19-70323 hdh11 Doc 40 Filed 04/20/20 Entered 04/20/20 15:24:40 Page 4 of 13

M.E. Ledue Construction

	Α	В	C	D	E
1	Date	Rec'd From:	Memo	Amount	Balance
2		Beginning Balance			\$444.39
3	3-Mar	WFHA	March	\$716.00	\$1,160.39
4	6-Mar	C Bryant	March	\$590.00	\$1,750.39
5	5-Mar	T Hansboro	March	\$37.00	\$1,787.39
6	5-Mar	J Smith	March	\$212.00	\$1,999.39
7	13-Mar	J Pineda	Feb final	\$100.00	\$2,099.39
8	20-Mar	J Pineda	March #1	\$250.00	\$2,349.39
9	27-Mar	J Pineda	March #2	\$250.00	\$2,599.39
10	31-Mar	WHA-late pymt for T. Hansboro	March	\$554.00	\$3,153.39
11	-		Month's Total	\$2,709.00	
13	17.1.00.430				
14				No. 1 Company of the Management of the Managemen	<u> </u>
15		Income minus Expenses		-\$806.98	-\$362.59

, ....---

M.E. Ledue Construction

march

	Çası	e <del> 19-70323-hdh1</del> 1	Poc 40 Filed 04/20/20 _ Entered 04/20/20 15:	24.40 Page	
				D D	E
1	Date Pd.	Paid To:	Purpose		
2		Pulse Power		Amount	Balance
3	Ì	Julio Hernandez	Elec. For 2209 4th #1	\$122.95	\$122.95
4			Roof repairs - 403 Polk	\$350.00	\$472.95
		Laborers	Shop work	\$324:00	\$796.95
5		WF - Water Dept	Water bills: 403 Polk, 2209 4th, 2210 5th	\$655.95	\$1,452.90
6		Sid Maldonado	Paint for 2210 5th #2	\$300.00	\$1,752.90
7	6-Mar	WF - Water Dept	Water bill: 411 Polk - Owner's Draw	\$61.14	\$1,814.04
8	8-Mar	Laborers	Shop work	\$364.00	\$2,178.04
9	9-Mar	Sid Maldonado	Labor to paint 2201 5th #2	\$175.00	\$2,353.04
10	10-Mar	Service One	HVAC repairs - 403 Polk #B	\$175.00	\$2,528.04
11	12-Mar	Stonemark Ins.	Insurance for Quads & 9th St.	\$284.59	\$2,812.63
12	12-Mar	Cirro Energy	Elec. For 2210 5th #1; Feb/March	\$221.38	\$3,034.01
13	19-Mar	Artistic Checks	checks for new ME Prop/ME Const DIP acct	\$7.47	\$3,041.48
14	20-Mar	D Enriquez	refunded sec. dep guarantee by B Kitchell	\$200,00	\$3,241.48
15	27-Mar	Stonemark Ins.	insurance	\$21.00	\$3,262.48
16	27-Mar	Ledue Household	Owner's draw	\$250.00	\$3,512.48
.7	31-Mar	First Nat'l Bank	monthly service charge	\$3.50	\$3,515.98
.8					
9			Month's Total		\$3,515.98
0					*
1					
2				<u> </u>	
3				····	

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B 25C (Official Form 25C) (12/08)

FILING OF THE CASE?

### **UNPAID BILLS**

PLEASE ATTACH A LIST OF ALL DEBTS (INCLUDING TAXES) WHICH YOU HAVE INCURRED SINCE THE DATE YOU FILED BANKRUPTCY BUT HAVE NOT PAID. THE LIST MUST INCLUDE THE DATE THE DEBT WAS INCURRED, WHO IS OWED THE MONEY, THE PURPOSE OF THE DEBT AND WHEN THE DEBT IS DUE. (THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)

TOTAL PAYABLES \$ 219,69

(Exhibit D)

### MONEY OWED TO YOU

PLEASE ATTACH A LIST OF ALL AMOUNTS OWED TO YOU BY YOUR CUSTOMERS FOR WORK YOU HAVE DONE OR THE MERCHANDISE YOU HAVE SOLD. YOU SHOULD INCLUDE WHO OWES YOU MONEY, HOW MUCH IS OWED AND WHEN IS PAYMENT DUE. (THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)

TOTAL RECEIVABLES \$ 17, 245.62

(Exhibit E)

### BANKING INFORMATION

PLEASE ATTACH A COPY OF YOUR LATEST BANK STATEMENT FOR EVERY ACCOUNT YOU HAVE AS OF THE DATE OF THIS FINANCIAL REPORT OR HAD DURING THE PERIOD COVERED BY THIS REPORT.

(Exhibit F)

**EMPLOYEES** 

NUMBER OF EMPLOYEES WHEN THE CASE WAS FILED? NUMBER OF EMPLOYEES AS OF THE DATE OF THIS MONTHLY REPORT?		Ø
PROFESSIONAL FEES		
BANKRUPTCY RELATED:		
PROFESSIONAL FEES RELATING TO THE BANKRUPTCY CASE PAID DURING THIS REPORTING PERIOD?	\$	J
TOTAL PROFESSIONAL FEES RELATING TO THE BANKRUPTCY CASE PAID SINCE THE FILING OF THE CASE?	\$_	75 oo oo
NON-BANKRUPTCY RELATED:		
PROFESSIONAL FEES NOT RELATING TO THE BANKRUPTCY CASE PAID DURING THIS REPORTING PERIOD?	\$	<u> </u>
TOTAL PROFESSIONAL FEES NOT RELATING TO THE BANKRUPTCY CASE PAID SINCE THE		• • •

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M.E. Ledue Properties

M.E. Ledue Properties Monthly Payables

M.E. L

March

-	Α	В	С	D	E
_1_	Bill Date	Payee	Purpose	Amount	Date Due
2					
3	1-Dec	Breegle's Bldg.	Flooring for 2209 4th St. #2	\$219.69	D 7
4		CONT. CO. Marie Contract Assessment Contract			
5					
6		Main is provided to the			
7		Control of the Contro			
8					
9					·
10			Total	\$219.69	111 12100000000000000000000000000000000
11				to comment or management of the standard decidence of the standard section of	
12					

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M.E. Ledue Properties

M.E. Ledue Properties Monthly Receivables

M.E. Led@a\$enge-70823-hdh11 Doc 40 Filed 04/20/20 Entered 04/20/20 15:24:40 Page 8 of 13

March

	A	В	C	l D l	E
1	Bill Date	Debtor	Purpose	Amount	Date Due
2	1-Dec	Chris Hooper	Rent	\$560.00	5-Dec
3	1-Nov	Chris Hooper	Rent	\$560.00	5-Nov
4	1-Oct	Chris Hooper	Rent	\$560.00	5-Oct
5	1-Sep	Chris Hooper	Rent	\$560.00	5-Sep
6	1-Aug	Chris Hooper	Rent	\$500.00	5-Aug
7	1-Mar	Kathy Hooper	Rent	\$520.00	5-Mar
8	1-Feb	Kathy Hooper	Rent	\$520.00	5-Feb
9	1-Jan	Kathy Hooper	Rent	\$520.00	5-Jan
10	1-Dec	Kathy Hooper	Rent	\$520.00	5-Dec
11	1-Nov	Kathy Hooper	Rent	\$520.00	5-Nov
12	1-Oct	Kathy Hooper	Rent	\$324.57	5-Oct
13	26-Nov	Truity Construction	Inv 53254: Materials	\$5,019.Ò0	15-Jan
14		Jose Pineda	Back Rent	\$1,562.05	-
15	-				
16			A CONTRACTOR OF THE PARTY OF TH		
17			Total Receivables	\$12,245.62	
18		•		· · · · · · · · · · · · · · · · · · ·	
19	- private discount	1			

### Wells Fargo Everyday Checking

March 25, 2020 🖪 Page 1 of 3



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### Questions?

Available by phone 24 hours a day, 7 days a week: Telecommunications Relay Services calls accepted

1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833 En español: 1-877-727-2932

雞語 1-800-288-2288 (6 am to 7 pm PT, M-F)

Online: wellslargo.com

Write: Wells Fargo Bank, N.A. (808)

P.O. Box 6995

Portland, OR 97228-6995

### You and Wells Fargo

Thank you for being a loyal Wells Fargo customer. We value your trust in our company and look forward to continuing to serve you with your financial needs.

### **Account options**

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

•			
Online Banking	$\overline{Z}$	Direct Deposit	
Online Bill Pay	$\mathbf{Z}$	Auto Transfer-Payment	
Online Statements		Overdraft Protection	
Mobile Banking	1	Debit Card	
My Spending Report	Z	Qverdraft Service	

### Activity summary

 Beginning paratice on 2/28
 \$0.00

 Deposits/Additions
 693-39

 Withdrawals/Subtractions
 - 68.61

 Ending balance on 3/25
 \$624.78

Account number: 5001985950

CONNIE LEDUE

Texas/Arkansas account forms and conditions apply

For Direct Deposit use

Routing Number (RTN): 111900659

### Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store

### 

March 25, 2020 # Page 2 of 3



### Transaction history

Date	Check Number	Description	Deposits/ Additions	Withdrawals: Subtractions	Ending dolly balance
2/28		Edeposit IN Branch/Store 02/28/20 06:21:45 Pm 4590 (el) Blvd	J444.39	Subtreetions	444.30
		Wichita Falls TX S453	•	j	
3/9		Purchase authorized on 03/06 CT-Wichita-Falls-U 940-761-7414		J51,14	383.25
		TX 5460066703642366 Card 5453			
3/10		Mobile Deposit : Ref Number :213100241432	J 37.00		•
3/10		Mobile Deposit : Ref Number :313100241768	/212.00		837.25
3/25		Purchase authorized on 03/24 Dcu*Your Check Ord	U.	17.47	624.78
		800 844 2843 CO \$380084280236410 Card 5453		•	32.770
Ending bala	ance on 3/25				624.78
Totals			\$693.39	\$68,61	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding an your account when your transactions posted, from assessed. If you had insufficient available funds when a transaction posted, fees may have been assessed.

### Monthly service fee summary

ror a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker, Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 02/28/2020 - 03/25/2020	Standard monthly service fee \$10.00	You paid \$0.00
We waived the fee this fee period to allow you to meet the requirements to a need to meet the requirement(s) to avoid the monthly service fee.	avoid the monthly service fee, Your fee waiver	is about to expire. You will
How to avoid the monthly service fee	Minimum required	· This fee period
Have any ONE of the following account requirements		
Minunum dally balance	\$1,500.00	·\$383.25 []]
<ul> <li>Total amount of qualifying direct deposits</li> </ul>	\$500.00	\$0.00 🗀
<ul> <li>Total number of posted debit card purchases or posted debit card paym bills in any combination</li> </ul>	nents of 30	2
<ul> <li>the fee is warved when the account is linked to a Wells Fargo Campus A Campus Debit Card</li> </ul>	TM or	

Mondeli	v carries	fee discour	tich lann	liad whan	bosie	chacked)
ALC: LEGIST	ABELAINE	(CE U(54.(/LI)	III I I WALL	HER ALLIGAT	V V A 12	LIICUNCU,

Age of armary account owns	(\$ 17 - 24 (\$10,00 thiscount)
----------------------------	---------------------------------

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6.402 (Fr. 1008); 24 Upp 1 1902(Fr. 100)

. Case 19-70323-hdh11 Doc 40 Filed 04/20/20 Entered 04/20/20 15:24:40 Page 11 of 13 Page 4

B 25C (Official Form 25C) (12/08)

### **PROJECTIONS**

COMPARE YOUR ACTUAL INCOME AND EXPENSES TO THE PROJECTIONS FOR THE FIRST 180 DAYS OF YOUR CASE PROVIDED AT THE INITIAL DEBTOR INTERVIEW.

	Projected	Actual	Difference		
INCOME	\$	<b>S</b> S	. \$		
EXPENSES	S	\$	\$		
CASH PROFIT	S	_ s	\$	<del></del> :	
TOTAL PROJEC	TED INCOME FOR THE N	EXT MONTH:		\$	
TOTAL PROJECTED EXPENSES FOR THE NEXT MONTH:					
TOTAL PROJEC	TOTAL PROJECTED CASH PROFIT FOR THE NEXT MONTH:				

### ADDITIONAL INFORMATION

PLEASE ATTACH ALL FINANCIAL REPORTS INCLUDING AN INCOME STATEMENT AND BALANCE SHEET WHICH YOU PREPARE INTERNALLY.

Case 19-70323-hdh11 Doc 40 Filed 04/20/20 Entered 04/20/20 15:24:40 Page 12 of 13 M.E. Ledue Construction

1:43 PM

**Balance Sheet** 

04/20/20 Accrual Basis

As of March 31, 2020

	Mar 31, 20
ASSETS Current Assets Checking/Savings DIP Account	895.99
Total Checking/Savings	895.99
Accounts Receivable Accounts Receivable	1,039.00
Total Accounts Receivable	1,039.00
Total Current Assets	1,934.99
Fixed Assets Real Estate 14th St Warehouse/Bus Station 4th St / Polk St. Apartments 5th St. Apartments 9th Street	85,000.00 262,000.00 119,708.33 75,000.00
Total Real Estate	541,708.33
Total Fixed Assets	541,708.33
TOTAL ASSETS	543,643.32
LIABILITIES & EQUITY Liabilities Long Term Liabilities Notes Payable FNB of WF - 9th St. Property Tax Loan USCU - Quads -76719-19 USFCU-14th St 76719-40	9,206.66 11,726.76 149,386.40 61,945.51
Total Notes Payable	232,265.33
Total Long Term Liabilities	232,265.33
Total Liabilities	232,265.33
Equity Owners Draw/Equity	257,568.93
Total Equity	257,568.93
TOTAL LIABILITIES & EQUITY	489,834.26

1:46 PM 04/20/20 Accrual Basis

### M.E. Ledue Construction Profit & Loss March 2020

	Mar 20
Ordinary Income/Expense	
Income	
Rental	3,831.00
Total Income	3,831.00
Gross Profit	3,831.00
Expense	
Bank Fees	0.20
Contract Labor	688.00
HVAC	175.00
Insurançe	326.59
Refund	200.00
Remodeling	455.00
Utilities	38.48
Total Expense	1,883.27
let Ordinary Income	1,947.73
Income	1,947.73

### **EXHIBIT "D"**

⊏	
(I)	
ŭ	
$\dot{\mathbf{H}}$	

	Value	Liquidated Value		
art 1 - Real Estate	Value	Liquidation Value	Debt	Equity
411 Polk St.	\$42,800.00	Exempt		
1605 Carol Lane	\$235,000.00	\$125,000.00	\$122,000.00	
109 4th St. (includes 403 Polk St.)	\$250,000.00	\$137,500.00	\$187,000.00	
2210 5th St.	\$125,000.00	\$68,750.00	also with 2209 4th	
1917 9th St.	\$50,000.00	\$27,500.00	\$9,100.00	
1915 9th St.	\$12,000.00	\$6,600.00	\$30,130.95	
2116 Roberts	\$3,000.00	\$1,650.00	Taxes \$45,000.00	
1410 25th St.	\$2,500.00	\$1,375.00		
1408 14th St.	\$82,000.00	\$55,000.00	\$55,000.00	
Total:	\$802,300.00	\$423,375.00	\$448,231	
Part 2 - Vehicles				
115 Subaru Outback	\$17,000.00	Exempt		
014 Ram Promaster Van	\$15,300.00	Exempt		
996 Lincoln Towncar	\$1,625.00	\$900.00		
1995 Jaguar XJS	\$5,100.00	\$2,500.00		
Total:	\$39,025.00	\$3,400.00		

\$6,600.00

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Exempt	Exempt	Exempt	Exempt	\$0.00
\$5,000.00	\$3,000.00	\$200.00	\$8,000.00	\$16,200.00
Household goods	Electronics	Sports Equipment	Clothing & Jewelry	Total:

## Part 4 - Financial Assets

\$1,600.00	\$5,000.00	\$0.00	\$6,600,00
\$1,600.00	\$32,000.00	\$717.00	\$34.317.00
Wells Fargo Accts.	Unpaid Salary	Unclaimed Property	Total

# Part 5 - Business-Related Property

Unpaid rents	\$7,226.00	\$2,000.00
Office Equip.	\$4,500.00	Exempt
Machinery & Tools	\$14,300.00	Exempt
18' Trailer	\$1,500.00	Exempt
40' Storage Trailer	\$1,500.00	Exempt
Total	\$29,026,00	\$2,000.00

\$2,000.00	00 009 8\$
\$2,000.00	¢435 375 00
\$29,026.00	4920 868 00

**Grand Totals:** 

### **EXHIBIT "E"**

### **EXHIBIT E**

The amount of cash on hand on the effective date of the Plan will be \$8,000.00 that will come from the Debtors' operations.

**EXHIBIT "F"** 

## Five Year Projection

Current

5 years

Rental Income:	Monthly	Annually	Monthly	Annually
Quads: 75% Occupancy	4,950.00	59,400.00	5,850.00	70,200.00
Avg Rent: \$550 / \$650				
14th St. Rent	150.00	1,800.00	200.00	6,000.00
Tools & Equipment	100.00	1,200.00	350.00	4,200.00
Vehicle Leases (3 / 2)	689.00	8,268.00	920.00	11,400.00
	Income Total	70,668.00	Income Total	91,800.00
Expenses:				
Water - Quads	625.00	7,500.00	850.00	10,200.00
Utilites - Quads	40.00	480.00	65.00	780.00
Eviction Costs		325.00	5.00	450.00
Repairs:				
Appliance Repair/Replacement	ent	350.00		500.00
HVAC	(Repairs)	Anticipate 1,250.00 units / yr	Anticipated Replcmnts; 2 units / yr	5,000.00
Plumbing		665.00		750.00
Lawn Care		800.00		1,000.00
Pest Control		125.00		200.00
Property Insurance	360.00	4,320.00	200.00	6,000.00
Property Taxes		17,121.00 (	17,121.00 (2) Prop. To be sold	16,000.00

Loans		3,600.00		1,535.00
	Expense Total	36,536.00	Expense Total	42,415.00
Construction:				
Income		13,650.00		15,000.00
	Income Total	13,650.00	Income Total	15,000.00
Expenses:				
Laborers		2,000.00		3,000.00
Auto Expenses		420.00		550.00
	Expense Total	2,420.00	Expense Total	3,550.00
	Income	84,318.00 Income		106,800.00
	Expenses	38,956.00 <b>Expenses</b>		45,965.00
Grand Totals		45.362.00		60.835.00